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and

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
)	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,)	
)	Case No. 08-13555 (JMP)
Debtors.)	
)	Jointly Administered

**VERIFIED STATEMENT OF KIRKLAND & ELLIS LLP
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, Kirkland & Ellis LLP ("K&E") files this statement in connection with its representation of certain creditors and parties-in-interest in the chapter 11 cases of the above-captioned debtors and debtors-in-possession (the "Debtors"), and respectfully states as follows:

1. K&E currently represents the following sixteen creditors and parties-in-interest (collectively, the "Represented Parties") in the above-captioned cases:

- (a) Liquidators of Lehman Brothers Australia Limited
c/o Mr. Neil Singleton and Mr. Stephen Parbery
PPB, Level 46, MLC Centre
19 Martin Place
Sydney NSW 2000, Australia
- (b) Pulsar Re, Ltd.
Cumberland House, 7th Floor
One Victoria Street
Hamilton HM 11, Bermuda
- (c) Venoco, Inc.
6267 Carpinteria Avenue, Suite 100
Carpenteria, CA 93013-2802
- (d) Dow Corning Corp.
2200 W. Salzburg Road
Auburn, MI 48611
- (e) Silverpeak Real Estate Partners
(f/k/a Lehman Brothers Real Estate Partners and
its Affiliate Funds and Subsidiaries)
1271 Avenue of the Americas, 38th Floor
New York, NY 10020
- (f) PCCP, LLC
(f/k/a Lehman Brothers Real Estate Mezzanine Partners, L.P. and
its Affiliate Funds and Subsidiaries)
280 Park Avenue, 35th Floor West
New York, NY 10017
- (g) King Street Capital, L.P.
65 East 55th Street, 30th Floor
New York, NY 10022
- (h) York Capital Management, L.P.
As Successor in Interest to Pequot Short Credit Master Fund, Ltd.
767 Fifth Avenue, 17th Floor
New York, NY 10153

- (i) Smurfit Kappa Acquisitions
f/k/a JSG Acquisitions
f/k/a MDCP Acquisitions I
Beech Hill
Clonskeagh
Dublin, 4
Ireland
- (j) Ferrero S.P.A.
f/k/a P. Ferrero & C. S.P.A.
c/o Direzione Finanza
Piazzale Ferrero, 1
Alba, 12051
Italy
- (k) Ferrero Trading Lux SA
6e Route De Treves
Senningerberg, L-2633
Luxembourg
- (l) QVT Fund LP
c/o Nick Brumm
QVT Financial LP
1177 Avenue of the Americas, 9th Floor
New York, NY 10036
- (m) New Silk Route PE Asia Fund LP
c/o New Silk Route Partners, Ltd
540 Madison Avenue, 38th Floor
New York, NY 10022
- (n) 40|86 Advisors, Inc.
535 N. College Drive
Carmel, IN 46032
- (o) Farallon Capital Partners
One Maritime Plaza, Suite 2100
San Francisco, CA 94111
- (p) Magnetar Capital Master Fund, Ltd.
c/o Magnetar Financial LLC
1603 Orrington Avenue, 13th Floor
Evanston, IL 60201

2. Each of the Represented Parties has claims or rights arising solely by virtue of their contractual, statutory, and/or common law rights with or against the Debtors, and/or by operation of law and has filed proofs of claim against the Debtors for various liquidated and unliquidated amounts.

3. Each of the Represented Parties retained K&E to represent its interests in connection with the Debtors' chapter 11 cases. K&E's representation of each Represented Party commenced at various times during the pendency of the Debtors' chapter 11 cases. K&E represents each of the Represented Parties as an individual party and does not represent the Represented Parties as a group.

4. Upon information and belief formed after due inquiry, K&E has no independent claims against or equity interests in the Debtors.¹

5. K&E reserves the right to revise, supplement, and/or amend this verified statement as may be appropriate or necessary.

¹ K&E has, however, been listed on the Debtors' Amended Schedules of Assets and Liabilities, Schedule G, Executory Contracts and Unexpired Leases.

I verify under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Respectfully submitted,

New York, New York
Dated: April 27, 2011

/s/ James H.R. Sprayregen

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